

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

WOLFRAM ARNOLD, et al.,

Plaintiffs,

v.

X CORP. f/k/a TWITTER, INC., et al.

Defendant.

C.A. No. 1:23-cv-528-JLH-CJB

**PLAINTIFFS' MOTION TO PROVISIONALLY SEAL
REPLY IN SUPPORT OF THEIR REQUEST TO
FILE AMICUS BRIEF AND REQUEST FOR LEAVE TO FILE
ADDITIONAL SUPPLEMENTAL AUTHORITY**

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Attorneys for Plaintiffs

Pursuant to this Court’s Manuals on filing, including Electronic Filing Tips for Attorneys and Electronic Filing of Sealed Civil Documents, Emmanuel Cornet, Justine De Caires, Lenn Kindel (f/k/a Grae Kindel), Alexis Camacho, Jessica Pan, Emily Kim, Miguel Andres Barreto, and Brett Menzies Folkins, on behalf of themselves and all other similarly situated (collectively “Cornet Plaintiffs”) hereby move to provisionally seal their Reply in Support of their Request to File *Amicus* Brief and Request for Leave to File Additional Supplemental Authority (“Reply and Request for Leave”) and accompanying exhibits.

The Reply and Request for Leave (Exhibit A) responds to Twitter’s opposition to Cornet Plaintiffs’ Motion for Leave to File *Amicus* Brief (Dkt. 115-1) and informs the Court of four more arbitration awards (Exhibits 1-3 to the Reply and Request for Leave, attached hereto as Exhibits B-D). Exhibit 4 to the Reply and Request for Leave (attached hereto as Exhibit E) is a discovery letter submitted by Twitter in an arbitration. Exhibit 5 to the Notice and Reply (attached hereto as Exhibit F) is a copy of Twitter’s Notice of Supplemental Authority that it filed in multiple proceedings with respect to one of the arbitration awards.

Because Twitter takes the position that arbitration awards and filings are confidential, Cornet Plaintiffs have filed the documents under seal.

Plaintiffs therefore request leave to provisionally file Exhibits A-F under seal. Because the arbitral awards contain some personally identifying information,

if the Court is disinclined to permit the entirety of the documents to be filed under seal, Cornet Plaintiffs respectfully request the opportunity to submit redacted versions removing identifying information for the claimants in those arbitrations.

Dated: January 13, 2025

Respectfully submitted,

EMMANUEL CORNET, JUSTINE DE CAIRES, GRAE KINDEL, ALEXIS CAMACHO, JESSICA PAN, EMILY KIM, MIGUEL BARRETO, and BRETT MENZIES FOLKINS, on behalf of themselves and all others similarly situated,

By their attorneys,

/s/ Kate Butler

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CERTIFICATE OF SERVICE

I, Kate Butler, hereby certify that a true and accurate copy of the redacted version of this document was served on all counsel of record in this matter via filing on the Court's CM/ECF system and that Cornet Plaintiffs have served the sealed version of this document on Defendant's counsel via email on January 13, 2025.

/s/ Kate Butler
Kate Butler